

EXHIBIT 1

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Cc: [Ingber, Matthew D.](#); [Haupt, Christopher J.](#)
Subject: HSBC Coordinated RMBS Actions, Nos. 14-CV-8175, et al. (SDNY)
Date: Friday, June 9, 2017 11:34:39 PM
Attachments: [HSBC's Rule 30\(b\)\(6\) Notice to the Triaxx Plaintiffs.pdf](#)

Counsel,

Please see attached.

Regards,

Jim

Jim Ancone

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**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

ROYAL PARK INVESTMENTS SA/NV,

Plaintiff,

v.

HSBC BANK USA, NATIONAL
ASSOCIATION,

Defendant.

Case No. 14-CV-8175-LGS-SN

BLACKROCK BALANCED CAPITAL
PORTFOLIO (FI), *et al.*,

Plaintiffs,

v.

HSBC BANK USA, NATIONAL
ASSOCIATION,

Defendant.

Case No. 14-CV-9366-LGS-SN

PHOENIX LIGHT SF LIMITED, *et al.*,

Plaintiffs,

v.

HSBC BANK USA, NATIONAL
ASSOCIATION,

Defendant.

Case No. 14-cv-10101-LGS-SN

NATIONAL CREDIT UNION
ADMINISTRATION BOARD, *et al.*,

Plaintiffs,

v.

HSBC BANK USA, NATIONAL
ASSOCIATION,

Defendant.

Case No. 15-cv-2144-LGS-SN

COMMERZBANK AG,

Plaintiff,

v.

HSBC BANK USA, NATIONAL
ASSOCIATION,

Defendant.

Case No. 15-cv-10032-LGS-SN

TRIAXX PRIME CDO 2006-1, LTD, *et al.*,

Plaintiffs,

v.

HSBC BANK USA, NATIONAL
ASSOCIATION,

Defendant.

Case No. 15-cv-10096-LGS-SN

**HSBC BANK USA, N.A.'S NOTICE
OF RULE 30(b)(6) DEPOSITION OF THE TRIAXX PLAINTIFFS**

TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

PLEASE TAKE NOTICE that pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, defendant HSBC Bank USA, N.A. will take the deposition upon oral examination of Triaxx Prime CDO 2006-1, Ltd., Triaxx Prime CDO 2006-2, Ltd., and Triaxx Prime CDO 2007-1, Ltd. ("Plaintiffs") before a notary public or other officer authorized to administer oaths at 9:00 am, June 16, 2017 at Mayer Brown LLP, 1221 Avenue of the Americas, New York, NY 10020 and will continue from day to day until completed. The deposition shall be recorded by stenographic means and/or by videotape.

PLEASE TAKE FURTHER NOTICE that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Plaintiffs are required to designate one or more of their officers, directors, managing agents, or other persons to testify on their behalf concerning the topics listed on Schedule A.

Dated: June 9, 2017

By: /s/ Matthew D. Ingber

Matthew D. Ingber
Christopher J. Houpt
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Telephone: (212) 506-2500

Counsel for HSBC Bank USA, N.A.

SCHEDULE A

DEFINITIONS AND INSTRUCTIONS

1. “HSBC” means HSBC Bank USA, National Association, and any of its officers, agents, employees, and/or attorneys.
2. “This Action” refers to the above captioned lawsuit.
3. “And” or “or” shall have the meaning provided in Rule 26.3 of the Local Rules of the U.S. District Court for the Southern District of New York.
4. “All,” “any,” “each,” or “every” shall have the meaning provided in Rule 26.3 of the Local Rules of the U.S. District Court for the Southern District of New York for “All/Any/Each.”
5. “Communication” shall have the meaning provided in Rule 26.3 of the Local Rules of the U.S. District Court for the Southern District of New York.
6. “Concerning” shall have the meaning provided in Rule 26.3 of the Local Rules of the U.S. District Court for the Southern District of New York. “Pertaining,” “reflecting,” “regarding,” or “relating” shall be construed as synonyms for “concerning.”
7. “Document” shall have the meaning provided in Rule 26.3 of the Local Rules of the U.S. District Court for the Southern District of New York.
8. “Employee” means any person who at any time acted or purported to act on behalf of an entity, or another person or persons including, but not limited to, all present and former accountants, advisors, agents, consultants, managers, officers, representatives, and staff personnel of such entity, person, or persons.
9. “Governing Agreement” includes Pooling and Servicing Agreements, Indentures, Collateral Management Agreements, Mortgage Loan Purchase Agreements, Custodial

Agreements, Servicing Agreements, Master Servicing Agreements, and any other similar document or contract that provides for, describes, or creates, any rights, obligations, or duties, related to any of the trusts at issue.

10. “Person” shall have the meaning provided in Rule 26.3 of the Local Rules of the U.S. District Court for the Southern District of New York.

11. “Plaintiffs” means the Plaintiffs in this Action, Triaxx Prime CDO 2006-1, Ltd. Triaxx Prime CDO 2006-2, Ltd. and Triaxx Prime CDO 2007-1, Ltd. and any of their directors, officers, agents, employees, and/or attorneys.

12. “RMBS” or “Residential Mortgage Backed Security” include any security or investment vehicle, however structured, using, involving, relating to, based on, or dependent on residential mortgages.

13. “Security” or “Securities” include any financial instrument, including any certificate, note, option or other instrument representing or relating to the debt of or ownership in any trust, corporation, company, partnership, or any person, natural or non-natural.

14. To the extent not otherwise defined, all words shall have their usual and ordinary meaning as the context of the request would indicate.

15. Capitalized terms not otherwise defined shall have the meaning assigned to them in the Governing Agreements.

16. References to the singular shall include the plural and vice versa.

TOPICS

1. Present and former business entities, including but not limited to third-party investment advisors, collateral managers, and board of directors, responsible for the analysis, acquisition, disposition, management, or monitoring of Plaintiffs' investments in RMBS.
2. The circumstances of Plaintiffs' creation as investment entities.
3. Activities undertaken by Plaintiffs or Plaintiffs' managers and advisors to acquire, analyze, monitor and manage Plaintiffs' RMBS portfolios.
4. Plaintiffs' knowledge of the facts underlying Plaintiffs' claim for damages.
5. Plaintiffs' policies and practices for document retention.
6. Plaintiffs' involvement in litigation, negotiations, proceedings, settlements, or investigations related to RMBS, including but not limited to the litigation recovery efforts Plaintiffs employed and that are described in the Notice to Noteholders, dated April 24, 2014. *See TRIAXX00029567 – TRIAXX00029632.*
7. Plaintiffs' involvement in prior negotiations, proceedings, and settlements related to RMBS trusts.
8. Plaintiffs' communications with HSBC in connection with Plaintiffs' investments in the trusts at issue.
9. The basis of Plaintiffs' understanding of HSBC's role as trustee and its obligations and duties with respect to the trusts at issue.
10. Plaintiffs' efforts to direct and indemnify HSBC, or any other RMBS trustee, to conduct any investigation into RMBS trusts, including but not limited to investigations of alleged breaches of representations and warranties and/or alleged Events of Default.
11. Plaintiffs' efforts to communicate knowledge of any alleged Event of Default to HSBC or any other RMBS trustee.

12. Plaintiffs' discovery, if any, of alleged breaches of representations and warranties in their RMBS portfolios, including but not limited to the timing of such discovery.

13. Plaintiffs' review of and/or reliance on information or documents prepared by HSBC, including but not limited to initial mortgage certifications, delay document certifications, remittance reports, and/or document exception reports, in connection with Plaintiffs' investments in the trusts at issue.

14. Plaintiffs' awareness of any alleged underwriting breaches, Events of Default, and/or document defects concerning the trusts at issue, including but not limited to the timing of such discovery and any responses by Plaintiffs to such discovery.

15. Plaintiffs' knowledge about foreclosures and delinquencies in the RMBS market.

16. Plaintiffs' communications with the master servicer, servicer, or originators for the trusts at issue.

17. Plaintiffs' communications, agreements, or other involvement with persons or third-party entities that offered to assist Plaintiffs, actually did assist Plaintiffs, or otherwise acted on Plaintiffs' behalf to evaluate, prepare for, or pursue litigation, negotiations, proceedings, settlements or investigations related to RMBS.

18. Any models, analytics systems, tools, software, or any other type of system that Plaintiffs or their managers or advisors have employed in connection with Plaintiffs' RMBS portfolios.

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was served on June 9, 2017, upon the following by email:

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